

# **Exhibit 12**

**From:** [Ventura, Catie](#)  
**To:** [Oot, Patrick L. \(SHB\)](#); [Shoshtari, Adam M. \(SHB\)](#)  
**Cc:** [Levy, Jennifer](#); [Welch, Donna M.](#); [Knapp, Timothy](#); [Stampfl, Karl](#)  
**Subject:** Opioid Litigation: August 2020 Production of Sept. 2011 Cegedim Audit re Watson Pharma  
**Date:** Thursday, September 3, 2020 1:15:16 PM

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Patrick and Adam –

Can we set up a call tomorrow to talk about IQVIA's recent production of the September 2011 Cegedim Audit re Watson Pharma to Teva for production in the MDL?

As you may recall, I first wrote to you on February 5, 2019 to request copies of any such audits. On February 15, 2019, you responded by letter and stated that IQVIA would provide "the final set of readily-accessible deliverables with Buzzeo-related entities" by February 22, 2019. Having received no documents, I followed up by letter on May 29, 2019 indicating that we had not received any deliverables. I again referenced a Statement of Work we identified which indicates that "[t]he deliverable for this onsite review will be a report that identifies any gaps or other recommended changes to assist Customer in enhancing their SOM system to comply with DEA regulations and associated memorandum regarding SOM." I asked you to "please confirm that you do not have any such documents to provide, including the deliverable referenced in Statement of Work #1." I wrote to you a third time on June 13, 2019, again indicating that we had not received any deliverables, and again asking you to confirm whether or not you have a copy of the referenced audit report or any related documents as soon as possible. You produced 35 documents to Allergan on August 15, 2019, none of which contained the audit at issue or any related documents.

Given this, our team obviously had no reason to think IQVIA had any additional documents. As you may or may not know, the plaintiffs have now filed a sanctions motion suggesting that Allergan didn't search for the document or had it and nonetheless failed to produce it. Neither is true. In connection with our response, it is important that we understand specifically how and when this document was located by IQVIA and why it was not included in the materials provided to Allergan. Please let me know if there are times tomorrow that work for a call to discuss.

Thanks in advance for your help with this matter.

**Catie Ventura**

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